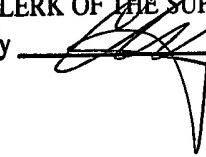


EXHIBIT “A”

Lawyay Package ID: 73a3c70d-872d-4a40-8732-4272e1718a0a

PLD-PI-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Jamie V. Retmier 308060 Scranton Law Firm 2450 Stanwell Drive Concord CA 94520 TELEPHONE NO: (925) 602-2727 FAX NO. (Optional): (925) 676-9999 E-MAIL ADDRESS (Optional): jamier@scrantonlawfirm.com ATTORNEY FOR (Name): Plaintiffs		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Alameda STREET ADDRESS: 1225 Fallon St. MAILING ADDRESS: CITY AND ZIP CODE: Oakland 94612 BRANCH NAME: Rene C. Davidson Alameda Courthouse		CLERK OF THE SUPERIOR COURT By  Deputy
PLAINTIFF: Meera Garg and Subhashish Garg DEFENDANT: SF Markets, LLC; Sprouts Farmers Markets, LLC		
<input checked="" type="checkbox"/> DOES 1 TO 50 COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): _____ Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): Premises Liability <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify): _____		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER: RG20075943

1. Plaintiff (name or names): Meera Garg and Subhashish Garg
alleges causes of action against defendant (name or names):
SF Markets, LLC; Sprouts Farmers Markets, LLC
2. This pleading, including attachments and exhibits, consists of the following number of pages: 5
3. Each plaintiff named above is a competent adult
 - a. except plaintiff (name):
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe): _____
 - (3) a public entity (describe): _____
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify): _____
 - (5) other (specify): _____
 - b. except plaintiff (name):
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe): _____
 - (3) a public entity (describe): _____
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify): _____
 - (5) other (specify): _____

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

Page 1 of 3

Lawyay Package ID: 73a3c70d-872d-4a40-8732-4272e1718a0a

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SHORT TITLE: Garg v. SF Markets, LLC et. al.	CASE NUMBER:
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4. Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

- a. except defendant (name): SF Markets, LLC
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):

(4) a public entity (describe):

(5) other (specify):
Limited Liability Company

- c. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):

(4) a public entity (describe):

(5) other (specify):

- b. except defendant (name): Sprouts Farmers Markets, LLC
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):

(4) a public entity (describe):

(5) other (specify):
Limited Liability Company

- d. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):

(4) a public entity (describe):

(5) other (specify):

Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

- a. Doe defendants (specify Doe numbers): 1-25 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
b. Doe defendants (specify Doe numbers): 26-50 are persons whose capacities are unknown to plaintiff.

7. Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

- a. at least one defendant now resides in its jurisdictional area.
b. the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
c. injury to person or damage to personal property occurred in its jurisdictional area.
d. other (specify):

9. Plaintiff is required to comply with a claims statute, and

- a. has complied with applicable claims statutes, or
b. is excused from complying because (specify):

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PLD-PI-001

SHORT TITLE: Garg v. SF Markets, LLC et. al.	CASE NUMBER:
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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. Motor Vehicle
- b. General Negligence
- c. Intentional Tort
- d. Products Liability
- e. Premises Liability
- f. Other (specify):

11. Plaintiff has suffered

- a. wage loss
- b. loss of use of property
- c. hospital and medical expenses
- d. general damage
- e. property damage
- f. loss of earning capacity
- g. other damage (specify):

Loss of Enjoyment of Life; Pain and Suffering; Loss of Consortium

12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. listed in Attachment 12.
- b. as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) compensatory damages
- (2) punitive damages

The amount of damages is (*In cases for personal injury or wrongful death, you must check (1)*):

- (1) according to proof
- (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: 09/30/2020

Jamie V. Retmier

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: Garg v. SF Markets, LLC et al.	CASE NUMBER:
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One

CAUSE OF ACTION—Premises Liability

Page 4

(number)

ATTACHMENT TO Complaint Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Prem.L-1. Plaintiff (name): Meera Garg and Subhashish Garg

alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.

On (date): January 17, 2019 plaintiff was injured on the following premises in the following

fashion (description of premises and circumstances of injury):

Plaintiff slipped and fell at Sprouts Farmers Market located at 3900 Mowry Ave, Fremont, CA 94538.

Prem.L-2. Count One—Negligence The defendants who negligently owned, maintained, managed and operated the described premises were (names):
SF Markets, LLC and Sprouts Farmers Markets, LLC Does 1 to 10Prem.L-3. Count Two—Willful Failure to Warn [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names):
SF Markets, LLC and Sprouts Farmers Markets, LLC Does 11 to 20Plaintiff, a recreational user, was an invited guest a paying guest.Prem.L-4. Count Three—Dangerous Condition of Public Property The defendants who owned public property on which a dangerous condition existed were (names):
SF Markets, LLC and Sprouts Farmers Markets, LLC Does 21 to 30

- a. The defendant public entity had actual constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.
- b. The condition was created by employees of the defendant public entity.

Prem.L-5. a. Allegations about Other Defendants The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): Does 31 to 40

- b. The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are described in attachment Prem.L-5.b as follows (names):
Does 41 - 50

SHORT TITLE: Garg v. SF Markets, LLC et. al.	CASE NUMBER:
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ATTACHMENT (Number): One*(This Attachment may be used with any Judicial Council form.)***Count Two - Loss of Consortium (Plaintiff Subhashish Garg Against All Defendants)**

Defendants are liable to Plaintiff Meera Garg's husband, Subhashish Garg, for loss of consortium. In order to prevail in a claim for loss of consortium, a Plaintiff must show (1) a valid and lawful marriage between plaintiff and the person injured at the time of injury; (2) a tortious injury to the plaintiff's spouse; (3) loss of consortium suffered by the plaintiff; and (4) the loss was proximately caused by the defendant's acts. Vanhooser v. Superior Court (2012) 206 Cal.App.4th 921.

The concept of loss of consortium includes the loss of love, companionship, comfort, care, assistance, protection, affection, society, moral support and the loss of enjoyment of sexual relations. Ledger v. Tippit (1985) 164 Cal.App.3d 625.

Here, all of the elements of this claim have been satisfied. (1) Mr. and Mrs. Garg were lawfully married at the time she was injured, (2) Mrs. Garg's injuries are the result of Defendant's negligence, and (3) There is no question Mr. Garg has suffered the loss of love, companionship, comfort, care, assistance, protection, affection, society, moral support and the loss of enjoyment of sexual relations. This was all caused by Defendant's breach of their duty of care to Mrs. Garg.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 5 _____ of 5 _____
(Add pages as required)